

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC) (JRC)

DECLARATION OF
JEREMY KOENIG

Jeremy Koenig declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the President of Digital Strategy of Giant Partners, Inc. (“Giant Partners” or “GP”), a non-party in this case.

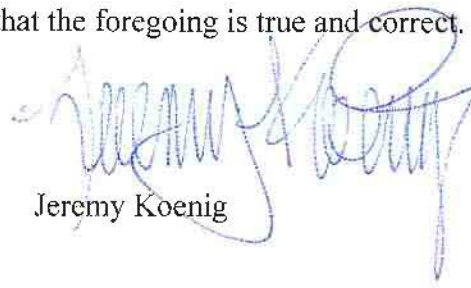
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of documents I maintain at my office in GP.

3. On April 10, 2023, I attended a virtual meeting with Safa Gelardi (“Safa”) where she discussed moving her then-existing business IME Companions LLC (“Companions”) to a new company that she was going to name Plaintiff Advocates.

4. After the virtual meeting, Safa decided to use the name IME Legal Reps instead of Plaintiff Advocates.

5. All the work GP performed for Safa that was discussed at the April 10, 2023 virtual meeting was for IME Legal Reps.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 18, 2024.



Jeremy Koenig